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Attorney for Defendant
ROBERT B. FRAIDENBURGH

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

IMPRIMIS INTERNATIONAL, INC.

Plaintiff,

vs.

ROBERT B. FRAIDENBURGH,

Defendant.

CASE NO. CIV.S-04-1297 FCD DAD

STIPULATION

Trial Date: November 15, 2005

IT IS HEREBY AGREED to and STIPULATED by and between the attorneys for Plaintiff IMPRIMIS INTERNATIONAL, INC. and Defendant ROBERT B. FRAIDENBURGH that Section IV of the Status (Pretrial Scheduling) Order be modified to provide that all discovery be completed by October 31, 2005.

Magistrate Judge Dale Drozd's order dated August 19, 2005 requiring Defendant Robert Fraidenburgh to appear at a deposition in Northern California demonstrates "good cause" as required for the modification of the Status Order.

In sum, the parties hereby Stipulate and Agree that based upon the foregoing, good cause exists to modify Section IV of the Status Order to provide that all discovery be completed by October 31, 2005.

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1 WHEREFORE, Plaintiff and Defendant hereby stipulate and request that the June 30, 2005,
2 close of discovery date be vacated and that the Status Order be modified to provide that all discovery
3 be completed by October 31, 2005.

4 IT IS SO STIPULATED.

5
6 Dated: _____.

Shawn M. Krogh
Attorney for Defendant ROBERT B.
FRAIDENBURGH

7
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10 Dated: _____.

Stephen A. Bamberger
Attorney for Plaintiff IMPRIMIS
INTERNATIONAL, INC.

ORDER

WHEREFORE, based upon a finding of good cause, the Court hereby vacates that June 30, 2005, close of discovery date.

IT IS FURTHER ORDERED that the Status Order be modified to provide that all discovery be completed by October 31, 2005.

IT IS FURTHER ORDERED in light of discovery the following dates are hereby reset: dispositive motions must be heard no later than January 13, 2006 at 10:00 a.m. All briefing as to the motions must be in compliance with Local Rule 78-230. The final pretrial conference is set for Friday, March 17, 2006 at 2:30 p.m. The joint final pretrial statement shall be filed no later than March 10, 2006. The parties shall refer to the court's Status Order filed November 30, 2004 as to the form and content of the statement. The jury trial is reset to Tuesday, May 23, 2006 at 9:00 a.m.

Dated: September 13, 2005

/s/ Frank C. Damrell Jr.
Frank C. Damrell Jr.
U.S. District Judge

COURT: *United States District Court, Eastern District of California*
CASE NO.: *CIV. S-04-1297 FCD DAD*
CASE NAME: *Imprimis International, Inc. v. Robert B. Fraidenburgh*

PROOF OF SERVICE

I am a citizen of the United States, employed in the County of Sacramento. My business address is 601 University Ave, Suite 250, Sacramento, California 95825. I am over the age of 18 years and not a party to the above-entitled action.

I am familiar with Radoslovich Law Corporation's practice whereby each document is placed in an envelope, the envelope is sealed, the appropriate postage is placed thereon and the sealed envelope is placed in the office mail receptacle. Each day's mail is collected and deposited in a U.S. mailbox at or before the close of each day's business.

On the date indicated below, I served the within:

STIPULATION

BY MAIL---

Placed in the United States Mail at Sacramento, California, a true copy in a sealed envelope with first class postage affixed and mailed as follows:

BY FAX AND MAIL---

I personally sent to the addressee's telecopier number a true copy of the above described document(s), and verified said transmission. Thereafter, I placed a true copy in a sealed envelope with first class postage affixed and mailed as follows:

BY PERSONAL SERVICE---

By causing delivered by hand to the addressee addressed as follows:

BY FEDERAL EXPRESS - - -

By causing delivery by Federal Express of the document(s), before the time due for pick-up, addressed as follows:

Stephen A. Bamberger
1529 Old Bridge Road, Suite 2
Woodbridge, VA 22192
Facsimile: (703) 499-9809

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration is executed on _____ at Sacramento, California.

Devika Datt